

# EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT  
FOR EASTERN DISTRICT OF PENNSYLVANIA**

THE MIDDLE EAST FORUM

Plaintiff,

v.

LISA REYNOLDS-BARBOUNIS

Defendant.

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CIVIL ACTION

NO. 2:19-cv-05697-JS

**DECLARATION OF SETH CARSON**

I Seth Carson am the attorney representing Defendant, Lisa Reynolds-Barbounis in above captioned matter.

1. My name is Seth Carson.
2. I am an attorney licensed to practice law in the Commonwealth of Pennsylvania.
3. I represent, Defendant, Lisa Reynolds-Barbounis in the above captioned matter.
4. I have reviewed Plaintiff's Exhibit C attached to Document 6 filed December 5, 2019 on the court's ECF system.
5. Document 6 is correspondence by email that I sent to the attorney representing the Middle East Forum in this matter.
6. My reference to information that no longer exists on the devices of my clients: this in no way related to Defendant, Lisa Barbounis.
7. I was referring to information which other clients had properly made certain was not retained, stored, or preserved on any of their personal electronic devices.
8. I swear under penalty of perjury that the foregoing is accurate, true and correct.

Signature of Affiant: \_\_\_\_\_



Name of Affiant: \_\_\_\_\_

Seth Carson

Date: January 20, 2020